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**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523

Chapter 11

**NOTICE REGARDING REVISED  
EXHIBITS TO MOTION OF THE DEBTOR  
FOR AN ORDER ESTABLISHING  
DEADLINES FOR FILING PROOFS OF  
CLAIM AND GRANTING RELATED  
RELIEF**

Judge: Hon. William J. Lafferty

Date: July 18, 2023

Time: 9:00 a.m.

Place: United States Bankruptcy Court  
1300 Clay Street  
Courtroom 220  
Oakland, CA 94612

1 The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor  
2 in possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter  
3 11 Case” or the “Bankruptcy Case”), hereby files this notice regarding agreed revised forms of final order  
4 and other forms in connection with the *Motion of The Debtor For an Order Establishing Deadlines For*  
5 *Filing Proofs of Claim and Granting Related Relief*, dated June 27, 2023 [Docket No. 181] (the  
6 “Motion”).<sup>1</sup>

7 The Debtor and the Committee have engaged in extensive discussions regarding the Motion and  
8 the *Objection of The Official Committee of Unsecured Creditors to The Motion of The Debtor For an*  
9 *Order Establishing Deadlines For Filing Proofs of Claim and Granting Related Relief* filed by the  
10 Committee [Docket No. 217] (the “Committee Objection”). Both the US Trustee and the Committee  
11 provided the Debtor with specific requested changes to the bar date order and related documents and asked  
12 that the Debtor respond to questions about the specific requested changes. The Debtor has therefore  
13 engaged in good faith negotiations with each in an attempt to resolve their specific requested changes.  
14 The Debtor previously filed a notice of a revised form of proposed order (the “Revised Order”) based on  
15 those discussions [Docket No. 248].

16 Attached hereto are revised forms of certain exhibits to the Motion (collectively, the “Revised  
17 Exhibits”), which the Debtor believes resolves substantially all of the issues raised by the US Trustee and  
18 the Committee as to these forms, subject to final agreement, as follows:

- 19 • Attached hereto as **Exhibit A** is a proposed form of Optional Supplement to Official Form  
20 410 for Use by Sexual Abuse Claimants (the “Supplement”), which replaces the Sexual  
21 Abuse Proof of Claim Form attached as Exhibit 3 to the Motion. Attached hereto as  
22 **Exhibit B** is a redline of the Supplement against the form Sexual Abuse of Proof of Claim  
23 attached to the Motion.
- 24 • Attached hereto as **Exhibit C** is a revised form of Confidentiality Agreement. Attached  
25 hereto as **Exhibit D** is a redline of the revised Confidentiality Agreement against the  
26 version attached as Exhibit 4 to the Motion.

27  
28 <sup>1</sup> Capitalized terms not defined in this notice have the meaning ascribed to them in the Motion.

1 The Debtor believes that the attached Revised Exhibits, together with the previously filed Revised  
2 Order, resolve substantially all of the issues raised by the US Trustee and the Committee, formal and  
3 informal, regarding the form of proof of claim to be used for abuse claims, and the form of Confidentiality  
4 Agreement;<sup>2</sup> however, all parties reserve their rights with respect to these and additional changes prior to  
5 the hearing on the Motion. Additionally, the Debtor and the Committee remain in discussions regarding  
6 the form of additional exhibits to the Motion as referenced in the Revised Order.

7  
8 DATED: July 17, 2023

**FOLEY & LARDNER LLP**

Jeffrey R. Blease  
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Matthew D. Lee

11 /s/ Shane J. Moses

12 SHANE J. MOSES

13 *Counsel for the Debtor*  
14 *and Debtor in Possession*

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27 <sup>2</sup> Continental Casualty Company and certain other insurers also filed an objection to the Motion [Docket  
28 No. 218] (the “Insurer Objection”). The Debtor does not anticipate that the attached form of Revised  
Order resolves the objections raised therein.